

Alan Alexander Beck  
Law Office of Alan Beck  
2692 Harcourt Drive  
San Diego, CA 92123  
(619) 905-9105  
Hawaii Bar No. 9145  
[Alan.alexander.beck@gmail.com](mailto:Alan.alexander.beck@gmail.com)

Stephen D. Stamboulieh  
Stamboulieh Law, PLLC  
P.O. Box 428  
Olive Branch, MS 38654  
(601) 852-3440  
[stephen@sdslaw.us](mailto:stephen@sdslaw.us)  
MS Bar No. 102784  
\*Admitted Pro Hac Vice  
Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII**

TODD YUKUTAKE and DAVID	)	
KIKUKAWA	)	
	)	
Plaintiffs,	)	
	)	Civil Action No. 19-578 (JMS-RT)
v.	)	
	)	
CLARE E. CONNORS, in her	)	DECLARATION OF COUNSEL
Official Capacity as the Attorney	)	
General of the State of Hawaii	)	
and the CITY and COUNTY	)	
OF HONOLULU	)	TRIAL: Not Scheduled
	)	JUDGE: Hon. J. Michael Seabright
	)	HEARING DATE: N/A
Defendants.	)	
_____	)	

**DECLARATION OF STEPHEN D. STAMBOULIEH**

I, Stephen D. Stamboulieh, declare as follows:

1. I am an attorney with the law firm of Stamboulieh Law, PLLC, counsel for Plaintiffs in the above-captioned action. I am admitted *pro hac vice* in this matter.

2. I am authorized and competent to testify to the matters contained in this declaration, and unless otherwise indicated, I make this declaration based upon personal knowledge.

3. I am an attorney licensed to practice in all state and federal courts in Mississippi; the Northern District of Texas; Southern District of Texas; Washington, D.C. District Court; Second, Third, Fourth, Fifth, Sixth, Ninth, Federal & District of Columbia Circuit Courts of Appeals; United States Court of Federal Claims; Northern District of New York; and the United States Supreme Court. I am a member in good standing of all the aforementioned courts.

4. Attached hereto as Exhibit “A” is a true and accurate copy of selected portions of Defendant’s Responses to Plaintiffs’ Interrogatories.

5. Attached hereto as Exhibit “B” is a true and accurate copy of Firearms Registrations in Hawaii, 2020.

6. Attached hereto as Exhibit “C” is a true and accurate copy of Firearms Registrations in Hawaii, 2019.

7. Attached hereto as Exhibit “D” is a true and accurate copy of Firearms Registrations in Hawaii, 2018.

8. Attached hereto as Exhibit “E” is a true and accurate copy of Firearms Registrations in Hawaii, 2017.

9. Attached hereto as Exhibit “F” is a true and accurate copy of permit to acquire firearms in the State of Hawaii and the County of Honolulu.

10. Attached hereto as Exhibit “H” is a true and accurate copy of selected portions of Defendant’s Responses to Plaintiffs’ Request for Production of Documents.

11. Attached hereto as Exhibit “G” is a true and accurate copy of selected portions of SB2954.

12. Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: April 28, 2021.

Respectfully submitted,

*Counsel for Plaintiffs*

/s/ Stephen D. Stamboulieh

Stephen D. Stamboulieh

Stamboulieh Law, PLLC

*\*Admitted Pro Hac Vice*